

# EXHIBIT I

**From:** Carlos Garcia Perez cgarciaperez@smgqlaw.com

**Subject:** Re: Bonnell / Doe

**Date:** October 3, 2025 at 1:46 AM

**To:** Andrew Brettler abrettler@berkbrettler.com

**Cc:** petersjoan petersjoan@bellsouth.net, Gustavo D. Lage GLage@smgqlaw.com, Andrea Garcia agarciaw2@gmail.com, Angie Velando angie@smgqlaw.com, Robert "Bob" L. Raskopf rraskopf@bilzin.com, Patricia M. Patino Ppatino@bilzin.com, Jake Camara jcamara@berkbrettler.com, Joel Sichel jsichel@berkbrettler.com, Regina Peter rpeter@berkbrettler.com, Maria Favela mfavela@berkbrettler.com

Good morning I hope everyone is doing well.

Let's please not confuse the issues . Your client's deposition is set for November 6 as agreed by the parties. The issue is the method and dates of our client's deposition. You now have 5 dates to pick when to depose our client. Please let us know when you are going to take her deposition.

As to the hardship , it's the negative impact that it will cause on her studies, among other issues. I hope we can all appreciate and understand that being the case . Again your client's depo is set for November 6, please let us know when you are going to take our client's deposition. Thank you and I hope you have a good day . Carlos

**CARLOS A. GARCIA PEREZ, ESQ.**

image001.jpg

**201 Alhambra Circle, Suite 1205, Miami, FL 33134**

**Office:**

**305.377.1000 Ext. 145**

On Oct 2, 2025, at 5:24 PM, Andrew Brettler <abrettler@berkbrettler.com> wrote:

**SECURITY NOTE: \*This email has originated from OUTSIDE of SMGQ Law. Please exercise caution with attachments and links \***

Carlos:

Regardless of where Plaintiff now resides, she filed this lawsuit in the Southern District of Florida. Our client is entitled to take her deposition there, in person. Her argument that it would be an undue burden to sit for a deposition in Miami because it would force her to miss classes just doesn't fly.

Nevertheless, to accommodate her schedule, we will agree to take Plaintiff's deposition in Miami on Nov. 24. However, we request that Mr. Bonnell's deposition be rescheduled for Nov. 25 to minimize the undue financial burden on him, and to limit the number of trips we'll need to make to Miami.

Please confirm this is acceptable. Thank you.

Sincerely,

**Andrew B. Brettler** | BERK BRETTLER LLP  
9119 W. Sunset Blvd. | West Hollywood, CA 90069  
O: +1.310.278.2111 | M: +1.917.620.2726

On Oct 2, 2025, at 7:25 AM, Carlos Garcia Perez <cgarciaperez@smgqlaw.com> wrote:

Good morning I hope you are all well.

I am following up on the previous email. Regarding the deposition of Plaintiff, she has made herself available to be deposed in Miami on November 21, 24 or 25<sup>th</sup>. Although you stated that you have a conflict with the November 21<sup>st</sup> date, you have provided no reason for your unavailability on November 24 or 25. Moreover, I respectfully remind you that you initially requested dates in November for Plaintiff's deposition. She is also available on November 7 and 14 via zoom.

Requiring Plaintiff to travel to Florida in October and certain dates in November would pose an undue burden to her, given that she currently resides out of state. Her travel to Miami would entail 16 hours plus the time on deposition causing her to miss important classes in school, among other issues. Accordingly, and for the reasons stated on my previous email, October will be very difficult to coordinate unless the deposition is taken by zoom on October 24. Also November 7 and 14 may work by zoom.

As you are aware, if a dispute between the parties arises as to the location of a deposition, the court may prescribe the time, place, and terms of the deposition "to protect a party or person from annoyance, embarrassment, oppression, or undue burden or expense." Fed.R.Civ.P. 26(c)(1)). Similarly, Rule 30(b)(4) provides that "[t]he parties may stipulate—or the court may on motion order—that a deposition be taken by telephone or other remote means." I sincerely hope that this issue can be resolved without the Court's intervention.

Finally, and on a separate matter, and **for attorneys' eyes-only**, we recently obtained Abby's last known address: [REDACTED].

Thank you and if you need to further discuss these issues we are available next week for a phone call with the exception of Tuesday. Carlos

**Carlos A. Garcia Perez**

**Partner**

<image002.png>

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**From:** Andrew Brettler <abrettler@berkbrettler.com>  
**Date:** Wednesday, October 1, 2025 at 8:37 AM  
**To:** Carlos Garcia Perez <cgarciaperez@smgqlaw.com>  
**Cc:** petersjoan <petersjoan@bellsouth.net>, Gustavo D. Lage <GLage@smgqlaw.com>, Andrea Garcia <agarciaw2@gmail.com>, Angie Velando <angie@smgqlaw.com>, Robert "Bob" L. Raskopf <rraskopf@bilzin.com>, Patricia M. Patino <Ppatino@bilzin.com>, Jake Camara <jcamara@berkbrettler.com>, Joel Sichel <jsichel@berkbrettler.com>, Regina Peter <rpeter@berkbrettler.com>, Maria Favela <mfavela@berkbrettler.com>  
**Subject:** Re: Bonnell / Doe

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Good morning Carlos.

Waiting a couple more days is fine, but if we don't have proposed dates for Plaintiff's in-person deposition, in Miami, in October, by this Friday, we will issue a deposition notice and select a date for Plaintiff's deposition that works for Mr. Bonnell and his counsel.

In addition to still needing to provide her availability for deposition, Plaintiff and her counsel owe us a considerable amount of discovery, as raised in our prior correspondence. See email from A. Brettler to J. Peters, et al., dated Sept. 27, 2025, and attached letter. Among other things:

- 1) Plaintiff's document production is still incomplete;
- 2) Plaintiff must amend her responses to the requests for production;
- 3) Lauren Hayden's document production in response to the subpoena is long overdue; and
- 4) Plaintiff's counsel has failed to provide current contact information for Abby Mc[REDACTED].

Please advise when we can expect compliance with these discovery obligations. Thank you.

Sincerely,

**Andrew B. Brettler** | BERK BRETTLER LLP  
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